

First Name: Robert
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Affiliation: I use 100% HPRD in my Tractor and Truck

Subject: Use of Used cooking oil to make Biodiesel in California

Comment:

Renewable Diesel is a superior drop in biofuel replacement for Fossil Diesel that is far superior to BioDiesel. BioDiesel is not a drop-in fossil diesel replacement and is actually detrimental to efforts for replacement of fossil fuel with biofuel because of its many problems even at B20 levels.

Used cooking oil is a feedstock that is most easily made into either RD or BD, but should not be wasted in California making BioDiesel.

The commenter's statement "BioDiesel is not a drop-in fossil diesel replacement and is actually detrimental to efforts for replacement of fossil fuel with biofuel because of its many problems even at B20 levels" argument has been satisfactorily addressed. Fuel quality of biodiesel blends B6 to B20 is controlled by ASTM standard D7467 and many diesel engine manufacturers recommend use of biodiesel up to B20. Additionally, given that both biodiesel and renewable diesel are primarily used in low blend levels there is currently plenty of room in the fuel pool to maximize use of both and displace an equivalent amount of fossil diesel. Used cooking oil feedstock is not "wasted" by producing biodiesel because there is not currently enough production capacity for renewable diesel to effectively utilize all of the feedstock.